



STATE OF WASHINGTON
WASHINGTON STATE BOARD OF HEALTH
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January 8, 2003

TO: Washington State Board of Health Members
FROM: Carl Osaki and Vickie Ybarra, WSBOH Members
RE: **SCHOOL INDOOR AIR QUALITY RECOMMENDATIONS**

Summary

The Board has received extensive public testimony from parents, teachers, and students regarding school indoor air quality concerns at Cle Elum-Roslyn schools. At its October 2002 meeting, the Board also heard presentations on school indoor air quality from state and local health department representatives, the Office of the Superintendent of Public Instruction (OSPI), school district representatives, and others.

On October 9, 2002 the Board passed a motion that appointed Board members Carl Osaki, Vickie Ybarra, and Ed Gray, along with DOH representative Maryanne Guichard, to a workgroup charged with developing policy recommendations regarding school indoor air quality and presenting those recommendations to the Board in January 2003. Today the Board will discuss the recommended Board actions developed by this workgroup, and decide the role the Board will play in school indoor air quality policy.

Recommended Board Actions

- 1. The Board continues to serve as a public forum to receive or elicit testimony regarding school-related environmental health concerns.**
- 2. The Board requests that Board staff prepare and submit a rule review document to the Board by July 2003 that includes the following elements:**
 - Review of WAC 246-366 with respect to results achieved and outcome measures.**
 - Review of WAC 246-366 and other relevant rules with respect to identification of a responsible party during construction and capital improvement projects.**
 - The appropriateness and practicality of plan review requirements and the pre-occupancy review process for new school construction or for school remodeling projects.**

- **The presence and usefulness of communication criteria related to health related school closures and remediation actions.**
 - **The frequency and scope of inspections.**
 - **A timeline and outline for any rule updates or revisions recommended in the rule review.**
- 3. The Board recommends that OSPI, the State Board of Education, and school district superintendents and boards:**
- **Develop school environmental health communication plans that include students, school staff, parents, community members and other interested individuals and organizations.**
 - **Allocate funds for local health departments' plan reviews, technical assistance and inspections.**
 - **Allocate funds for school health and safety repairs.**
- 4. The Board recommends that the Washington State Legislature designate funding for a school health and safety repair program, to assist OSPI, the State Board of Education, and school district superintendents and boards in establishing an ongoing program.**
- 5. The Board requests that OSPI update the Board on the status of OSPI's School Environmental Health Initiative in July 2003.**

Background

The Board has statutory authority RCW 43.20.050(1) to “provide a forum for the development of public health policy in Washington State,” and to “explore ways to improve the health status of the citizenry.”

The Board has statutory authority under RCW 43.20.050(2)(c) to:

adopt rules controlling public health related to environmental conditions including but not limited to heating, lighting, ventilation, sanitary facilities, cleanliness and space in all types of public facilities including but not limited to food service establishments, schools, institutions, recreational facilities and transient accommodations and in places of work.

The Board set minimal environmental standards for educational facilities in WAC 246-366. Local health officers review and approve new facility and major alteration plans, and make periodic inspections of each existing school within their jurisdictions (WAC 246-366-040). This rule does not indicate the frequency of inspection, how the inspections will be funded, or set specific criteria for evaluating indoor air quality. These rules were last revised in 1991 to include sound control standards. Local boards of health have the authority to establish fees for school plan reviews and inspections (RCW 70.05.060).

Statutory authority for school environmental health and determining construction and maintenance funding for school facilities lies with the State Board of Education, OSPI, school district superintendents, and school boards (RCW 28A.315 through 335).

In 1994, the Board adopted a motion on schools and school environments. This resulted in the Department of Health convening workgroups and producing several reports:

- School IAQ Best Management Practices Manual, February 1995
- Implementation Survey Report – WAC 246-366 Primary and Secondary Schools, February 12, 1997
- Health and Safety Guide for K-12 Schools in Washington, with OSPI, December 2000

School Indoor Air Quality has been a recurring topic during Board meetings over the last eight years. Most recently the Board heard testimony at its March, May, June, September, October, and December 2002 meetings from parents, students and teachers concerned about IAQ at Cle Elum schools. At its October 2002 meeting the Board also heard presentations on:

- OSPI's School Environmental Health Initiative
- Recommendations from the Healthy Schools Task Force (HSTF), a group of non-governmental organizations and government agencies
- DOH Cle Elum-Roslyn High School Health Survey
- Cle Elum-Roslyn Indoor Air Quality Coalition
- School IAQ Program "best practices"

In October 2002 the Board also received a "Summary of Recommendations Regarding How to Improve the Public Health and School Systems' Responses to School IAQ Problems" compiled by staff from the:

- Healthy Schools Task Force report
- Testimony received by the Board from parents, teachers and students concerned about school IAQ
- Recommendations from eight local health department and school district representatives
- Attorney General's school construction investigation
- Environmental Law Institute's *Healthier Schools: A Review of State Policies for Improving Indoor Air Quality*.

School IAQ problems are not limited to Cle Elum-Roslyn schools. Assessments of 156 Washington schools during the 2000-2001 school year found that 42.5 percent of classrooms had high carbon dioxide levels, indicating inadequate ventilation.

Last year OSPI received applications for Emergency School Repair and Renovation grants from 43 percent of school districts. More than \$25 million was requested, but the one-time federal funding provided only \$10.35 million. The applications provided information on the condition of many schools in the state. They also indicated that state and local funding of school repairs and renovations does not meet existing needs. (Please see www.k12.wa.us/facilities/esrr/ for more information.)

Several states address school repair and funding needs. Minnesota law establishes a “Capital Expenditure: Health and Safety” program that provides a small percentage of state revenue to schools for health and safety repairs. Maine law establishes a “School Revolving Renovation Fund,” which provides loans and grants for school repairs and renovations. (Environmental Law Institute’s *Healthier Schools: A Review of State Policies for Improving Indoor Air Quality*).

This past legislative session, two bills that would have an effect on school IAQ were proposed. One was Senate Bill 6356, creating a Children’s Environmental Health and Protection Advisory Council that would have been staffed by the Board. The other bill, Senate Concurrent Resolution 8426, would have created a Joint Select Committee on Indoor Mold Contamination to study the health effects of mold exposure and include school districts in its advisory groups. Both bills failed.